

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**RE: RACHEL M. McMILLIAN
DEBTOR**

**CASE NO: 23-13377-SDM
CHAPTER 13**

MOTION FOR MODIFICATION OF PLAN

COMES NOW the debtor and files this proposed modification of her Chapter 13 plan as follows:

The debtor filed this Chapter 13 petition on October 31, 2023. She proposed a fifty-eight (58) month plan. The Mississippi Department of Revenue filed a priority proof of claim (claim#9) in the amount of \$2,352.00 for sales taxes owed. The debtor respectfully requests to pay this priority amount of \$2,352.00 through her Chapter 13 plan. The debtor further requests that her wage order be amended accordingly.

WHEREFORE, the debtor prays that the Chapter 13 plan be modified as set forth above.

RESPECTFULLY submitted, this the 24th day of June 2024.

/s/ Kimberly B. Bowling
Kimberly B. Bowling
Attorney for Debtor

MITCHELL & CUNNINGHAM, PC
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Post Office Box 7177
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**RE: RACHEL M. McMILLIAN
DEBTOR**

**CASE NO: 23-13377-SDM
CHAPTER 13**

NOTICE OF MOTION FOR MODIFICATION OF PLAN

YOU ARE HEREBY NOTIFIED that a written response to the attached motion for modification of plan, must be filed with:

Shallanda J. Clay, Clerk of Court
Cochran U.S. Bankruptcy Court
Northern District of Mississippi
703 Highway 145 North
Aberdeen, MS 39703-0867

and a copy must be served on the undersigned debtor's Attorney, the Chapter 13 Trustee, U.S. Trustee, and all affected creditors on or before thirty (30) days from the date of this notice. In the event a written response is filed, the Court will notify you of the date, time, and place of the hearing thereon. If no written response is timely filed, the motion may be granted by the Court.

DATED: June 24, 2024

CHAPTER 13 STANDING TRUSTEE

Todd S. Johns
Post Office Box 1326
Brandon, MS 39043

/s/ Kimberly B. Bowling
ATTORNEY FOR DEBTOR
112 North Broadway
Post Office Box 7177
Tupelo, MS 38802-7177
(662) 407-0408

CERTIFICATE OF SERVICE

I, Kimberly B. Bowling, Attorney for the debtor, do hereby certify that I have this day either mailed, a true and correct copy by United States mail, postage prepaid or electronically mailed through the ECF system, the above and foregoing Motion for Modification of Plan and Notice of Motion for Modification of Plan to the following:

Chapter 13 Trustee
Todd S. Johns
tjohns13ecf@ch13mstrustee.com

U.S. Trustee
USTPRegion05.AB.ECF@gmail.com

Mississippi Department of Revenue
Bankruptcy Section
P.O. Box 22808
Jackson, MS 39225

DATED: June 24, 2024

/s/ Kimberly B. Bowling
Kimberly B. Bowling, 99906
Attorney for Debtor

MITCHELL & CUNNINGHAM, PC
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